

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

**DORIS ANN SCOTT and
ORIEL MOORE,**

Plaintiffs,

v.

TREVOR FOLEY, et al.,

Defendants.

Case No. 2:24-cv-04107-MDH

**DEFENDANTS DAVISON, WILLIAMS, WELLS, GLATCZAK, KOPP AND
NKWOCHA'S MOTION FOR EXTENSION OF TIME TO REPLY TO
PLAINTIFFS' MEMORANDUM IN OPPOSITION TO MOTION TO STAY**

COME NOW Defendants Justin Davison, Ryan Williams, William Wells, Craig Glatczak, Zachary Kopp and Onywuchi Nkwocha (hereinafter "Bystander Defendants") by and through their undersigned counsel, Scott R. Pool of Gibbs Pool and Turner, P.C., and request this Court grant an extension of time pursuant to Rule 6(b) of the Federal Rules of Civil Procedure to file Bystander Defendants' reply to Plaintiff's Memorandum in Opposition to Defendants Davison, Williams, Wells, Glatczak, Kopp and Nkwocha's Motion to Stay. Bystander Defendants respectfully state as follows:

1. Per Local Rule 7.0(c)3, Bystander Defendants' reply to said memorandum is currently due within 14 days of service of said memorandum, which was filed on April 9, 2025.

2. Bystander Defendants request a one-week extension of time to prepare

their reply.

3. Where the current due date is April 23, 2025, the requested extension would bring the due date to April 30, 2025.

4. This extension is requested for good cause, to allow sufficient time to prepare a full response to the content of Plaintiffs' Memorandum and further developments in the case with bearing upon Bystander Defendants' Motion for Stay.

WHEREFORE, Bystander Defendants Justin Davison, Ryan Williams, William Wells, Craig Glatczak, Zachary Kopp and Onywuchi Nkwocha respectfully request this Court grant a one-week extension of time to file their reply to Plaintiffs' Memorandum in Opposition to Bystander Defendants' Motion for Stay; and for such other and further relief as the Court deems just and proper.

Respectfully submitted,

GIBBS POOL AND TURNER, P.C.



Scott R. Pool #42484

Joseph P. Bjork #75208

3225 A Emerald Lane

Jefferson City, Missouri 65109

(573) 636-2614; (573) 636-6541 f

pool@gptlaw.net

jbjork@gptlaw.net

*Attorneys for Defendants Davison,
Williams, Wells, Glatczak, Kopp
and Nkwocha*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served via electronic filing on April 16, 2025, to:

Benjamin Stelter-Embry
1600 Genessee, Suite 956
Kansas City MO 64102
ben@embry-law.com
Lead Attorney for Plaintiffs

Ryan Bertels
Schreimann, Rackers & Francka, L.L.C.
931 Wildwood Drive
Suite 201
Jefferson City, MO 65109

Andrew Stroth
191 North Wacker Dr., Suite 2300
Chicago, IL 60606
844-878-4529
astroth@actioninjurylawgroup.com
Attorney for Plaintiffs

J. Thaddeus Eckenrode
11477 Olde Cabin Road #110
St. Louis, MO 63141
314-726-6670
jte@eckenrode-law.com
Attorney for Centurion of
Missouri, LLC

James Ormond and Steven Hart
One South Dearborn Street #1400
Chicago, IL 60603
312-955-0545
jormond@hmelegal.com

Dennis Harms
Sandberg Phoenix & von Gontard
701 Market #600
St. Louis MO 63101
314-446-4252
dharmes@sandbergphoenix.com

Jennifer Donnelly
Baty Otto Scheer
4435 Main Street #1100
Kansas City MO 64111
Attorney for Def. Bradshaw

Kevin Smith
MO Attorney General's Office
615 East 13th Street #401
Kansa City MO 64106
816-889-5016
Kevin.Smith@ago.mo.gov



Scott R. Pool

Cc: Anna Connelly
Justin Davison
Ryan Williams
William Wells
Craig Glatczak
Onywuchi Nkwocha
Zachary Kopp